

CENTRAL WISCONSIN COMMUNICATIONS, INC.
P.O. Box 8045
Wisconsin Rapids, Wisconsin 54495-8045

December 8, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Central Wisconsin Communications, Inc.
WC Docket No. 05-196
Compliance Letter

Dear Ms. Dortch:

In June 2005, the Federal Communications Commission (“Commission”) released an order requiring interconnected voice over Internet protocol (“VoIP”) providers to submit letters detailing their compliance with newly adopted enhanced 911 (“E911”) requirements.¹ On November 7, 2005, the Commission released a Public Notice specifying information which must be contained in the compliance letters.² Pursuant to the *VoIP 911 Order* and this Public Notice, Central Wisconsin Communications, Inc. (the “Company”), an interconnected VoIP provider, hereby submits the following:³

1. 911 Solution: The Company is able to provide 911 service to 100 percent of its active external subscriber base in the areas where it markets its VoIP service in compliance with the all of the rules established in the *VoIP 911 Order*.
 - a. 911 Routing Information/ Connectivity to Wireline E911 Network: The Company is transmitting “all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized”⁴ in the following manner:

¹ *IP-Enabled Services and 911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, 10273, para. 50 (2005) (“*VoIP 911 Order*”).

² *See Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 & 05-196; DA 05-2945, Public Notice (rel. Nov 7, 2005) (“Public Notice”).

³ The Company respectfully requests the Commission to accept this compliance letter which is being submitted after the reporting deadline.

⁴ *VoIP 911 Order*, 20 FCC Rcd 10269-70, para. 42 (footnote omitted).

The Company has one Selective Router to which it has interconnected. The Company utilizes the wireline network of its affiliated incumbent and competitive local exchange carriers (“LECs”) and the wireline network of SBC for the purpose of transmitting all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority. The wireline networks include the Selective Router which queries the incumbent LEC-maintained Selective Router Database to determine which PSAP serves the caller’s geographic calling area and forwards the call to the PSAP that has been designated to serve the caller’s area, along with the caller’s phone number.⁵

- b. Transmission of ANI and Registered Location Information: The Company is transmitting via the Wireline E911 Network the 911 caller’s ANI and Registered Location to all answering points that are capable of receiving and processing this information.
 - i. 100 percent of the answering points within the area where the Company is marketing its VoIP service are capable of receiving and processing ANI and Registered Location information that the Company transmits.
 - ii. 100 percent of the Company’s subscribers are those whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information.
- c. 911 Coverage: The Company has achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country where it markets its VoIP service.

- 2. Obtaining Initial Registered Location Information: The following is a detailed description of all actions the Company has taken to obtain each existing subscriber’s current Registered Location and each new subscriber’s initial Registered Location:

To ensure that the Company obtains each existing and each new subscriber’s Registered Location, the Company requires subscribers to provide on the initial order form the physical address where the device will be used. The Company places this information into its OSS as an order which is then placed into the ALI database through the assistance of Intrado’s network. Along with the order form, the Company requires its subscribers to execute its “CWCI VoIP End User Service Agreement” in which it specifies that “Failure to provide the correct and proper address location may result in misdirecting 911 calls to the incorrect PSAP or emergency operator and/or the failure to reach and render emergency service.”

⁵ See *VoIP 911 Order* at para. 15.

The Company reports that it obtains the initial registered location information for 100 percent of its subscribers.

3. Obtaining Updated Registered Location Information: The following is a detailed description of the method the Company has offered its subscribers to update their Registered Locations.

In its “CWCI VoIP End User Service Agreement”, which subscribers must execute when they initiate service, the Company states in bold, “You acknowledge that 911 dialing will not function properly if you move your Device to another service address, either temporarily or permanently, unless the new address has been properly recorded and in an area for which CWCI provides 911 Emergency Dialing.” This warning was repeated to existing subscribers in the form of mailings in August 2005. The Company informs all subscribers at the time that they sign up for service and in the form of labels that subscribers must place on their phone or other device that subscribers are able to update the physical location information by contacting the Company’s customer service department or on the company’s website at www.talkwithus.biz. The Company does not charge for this service.

4. Technical Solution for Nomadic Subscribers: The following is a detailed description of any technical solutions the Company is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

The Company is not aware of any technical solution that it can affordably implement to ensure that subscribers have access to 911 service whenever they use their service nomadically.⁶

5. Detailed statement as to whether and how the Company has implemented plans to address the Commission’s 911 provisioning requirements.

The Company is working with Intrado and TCS regarding implementation of a VPC server which would redirect 911 calls to the appropriate PSAP when the device is moved to a new physical location.

⁶ See *VoIP E911 Order* at para. 46 (“We recognize that it currently is not always technologically feasible for providers of interconnected VoIP services to automatically determine the location of their end users without end users’ active cooperation”).

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Please contact the undersigned with any questions.

Respectfully Submitted,

s/ Leif Street

Leif Street

Director of Marketing and Public Relations

cc: Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau
Janice Myles, Competition Policy Division, Wireline Competition Bureau
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